

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No: 21-CR-40039-SMY
	)	
MINGQING XIAO	)	
	)	
Defendant.	)	
	)	

**DEFENDANT MINGQING XIAO’S CONSENT MOTION FOR  
MODIFICATION OF RELEASE CONDITIONS**

Now comes Defendant Mingqing Xiao (“Defendant” or Dr. “Xiao”), by and through his attorneys, who hereby moves for a modification of his travel restrictions under the Order Setting Conditions of Release (“Release Conditions”) (ECF No. 14) and the subsequent Order modifying Defendant’s Release Conditions (ECF No. 112). In support of this motion, Dr. Xiao provides the following:

1. Pursuant to Dr. Xiao’s Release Conditions, “[t]ravel is restricted to the state of Illinois and ED/MO for attorney appointments. All requests for travel will require prior approval from the Court.” (ECF No. 14).

2. On March 25, 2022, Dr. Xiao filed the Consent Motion (ECF No. 111) in anticipation of his need to accompany his wife to a critical doctor’s appointment and to required follow-up appointments in St. Louis, MO.

3. Pursuant to the Court’s March 28, 2022 Order granting Dr. Xiao’s Consent Motion, Dr. Xiao’s Release Conditions were modified permit his travel to Missouri for the purpose of attorney appointments and medical appointments for himself and his immediate family members (ECF No. 112).

4. Dr. Xiao's minor daughter has earned a finalist position in a Speech & Debate Tournament in Louisville, Kentucky. Due to his wife's ongoing medical condition, she is not able to bring their daughter to the competition. Dr. Xiao, therefore, respectfully requests permission to accompany his daughter to the competition.

5. WHEREFORE, we respectfully request that Dr. Xiao's Release Conditions be modified to permit him to travel to Kentucky during the period of June 11-18, 2022 for the purpose of transporting and accompanying his daughter to and from the competition. Dr. Xiao's Probation Officer, Mr. Schuyler J. Stephens, as well as the Government, by AUSA Peter Reed, have no objection to this motion.

Dated: May 16, 2022

Respectfully submitted,

/s/ Ryan P. Poscablo  
Ryan P. Poscablo, *pro hac vice*  
Steptoe & Johnson LLP  
1114 Avenue of the Americas  
New York, NY 10036  
rposcablo@steptoe.com  
212.506.3900

Patrick F. Linehan, *pro hac vice*  
Steptoe & Johnson LLP  
1330 Connecticut Avenue, NW  
Washington, DC 20036  
plinehan@steptoe.com  
202.429.3000

Michelle Nasser  
Dowd Bennett LLP  
7733 Forsyth Blvd.  
Suite 1900  
St. Louis, MO 63105  
mnasser@dowdbennett.com  
314.889.7345

*Attorneys for Defendant Mingqing Xiao*

**CERTIFICATE OF SERVICE**

I hereby certify that on May 16, 2022 I electronically filed Defendant's Motion For Modification of Release Conditions with the Clerk of Court using the CM/ECF system which will send notification of such filing to all counsel of record, including:

Peter T. Reed  
Assistant United States Attorney  
9 Executive Drive  
Suite 300  
Fairview Heights, IL 62208

Scott A. Verseman  
Assistant United States Attorney  
9 Executive Drive  
Suite 300  
Fairview Heights, IL 62208

Shawn Derek Shugert  
Trial Attorney, National Security Division  
950 Pennsylvania Ave., NW  
Suite 7700d  
Washington, DC 20530

/s/ Ryan P. Poscablo  
Ryan P. Poscablo, *pro hac vice*  
Steptoe & Johnson LLP  
1114 Avenue of the Americas  
New York, NY 10036  
rposcablo@steptoe.com  
212.506.3900

*Attorney for Defendant Mingqing Xiao*